

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INDICTMENT

-V.-

: 08 Cr.

BRENDA PERKINS,
TASWAYSHA PERKINS, and
NICOLE PRICE,

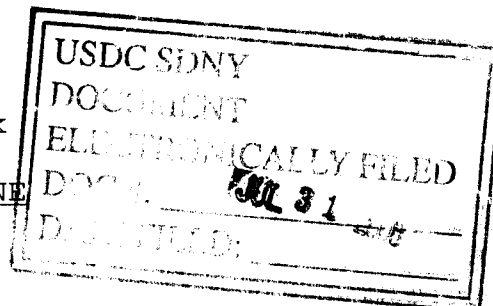
Defendants. :

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COUNT ONE

The Grand Jury charges:

08 CRIM 710



1. From at least in or about October 2004, up to the present, in the Southern District of New York and elsewhere, BRENDA PERKINS, TASWAYSHA PERKINS, and NICOLE PRICE, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 513(a).

2. It was a part and an object of the conspiracy that BRENDA PERKINS, TASWAYSHA PERKINS, and NICOLE PRICE, the defendants, and their conspirators, unlawfully, willfully, and knowingly, would and did make, utter, and possess a counterfeited security of an organization, in violation of Title 18, United States Code, Section 513(a).

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 10, 2008, TASWAYSHA PERKINS, the defendant, passed a counterfeit check at a retail store in Manhattan.

b. On or about May 6, 2008, NICOLE PRICE, the defendant, passed a counterfeit check at a retail store in Manhattan.

c. On or about March 5, 2007, BRENDA PERKINS, the defendant, passed a counterfeit check at a retail store in Stamford, Connecticut.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From at least on or about October 11, 2004, up to the present, in the Southern District of New York and elsewhere, the defendant, BRENDA PERKINS, unlawfully, knowingly, and wilfully, did make, utter, and possess a counterfeited security of an organization with the intent to deceive another person or organization, to wit, PERKINS passed counterfeit checks at retail stores.

(Title 18, United States Code, Sections 513(a) and 2.)

COUNT THREE

The Grand Jury further charges:

5. From at least on or about December 12, 2007, up to the present, in the Southern District of New York and elsewhere, TAYSWASHA PERKINS, the defendant, unlawfully, knowingly, and wilfully, did make, utter, and possess a counterfeited security of an organization with the intent to deceive another person or organization, to wit, PERKINS passed counterfeit checks at retail stores.

(Title 18, United States Code, Sections 513(a) and 2.)

COUNT FOUR

The Grand Jury further charges:

6. From at least on or about December 12, 2004, up to the present, in the Southern District of New York and elsewhere, NICOLE PRICE, the defendant, unlawfully, knowingly, and wilfully, did make, utter, and possess a counterfeited security of an organization with the intent to deceive another person or organization, to wit, PRICE passed counterfeit checks at retail stores.

(Title 18, United States Code, Sections 513(a) and 2.)

FORFEITURE ALLEGATION

7. As a result of committing the offenses alleged in this Indictment, BRENDA PERKINS, TASWAYSHA PERKINS, and NICOLE

PRICE, the defendants, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, constituting or derived from proceeds obtained directly or indirectly as a result of the offenses charged herein, to wit, conspiracy to pass counterfeit securities and passing counterfeit securities.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C.
§ 982(b), to seek forfeiture of any other property of said
defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United
States Code, Sections 1028, 1929 and 1930.)

Keith Miller
Foreperson

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

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NICOLE PRICE

Defendants.

INDICTMENT

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(18 U.S.C. § 371
18 U.S.C. §§ 513 and 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Keith Miller

Foreperson.

7/31/08 Filed indictment. A/W issued.
Case Judge Daniels.
S/Maf Judge Kaf